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ATTORNEYS FOR APPALOOSA  
MANAGEMENT L.P., WEXFORD CAPITAL LLC,  
LAMPE CONWAY & CO., LLC, HARBINGER CAPITAL  
PARTNERS, LLC AND MARATHON ASSET MANAGEMENT LLC

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

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|                                   |   |                         |
|-----------------------------------|---|-------------------------|
| In re                             | ) | Chapter 11              |
|                                   | ) |                         |
| Delphi Corporation, <u>et al.</u> | ) | Case No. 05-44481 (RDD) |
|                                   | ) | Jointly Administered    |
| Debtors.                          | ) |                         |
|                                   | ) |                         |

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**VERIFIED SUPPLEMENTAL STATEMENT OF WHITE & CASE LLP  
PURSUANT TO FED. R. BANKR. P. 2019**

TO: THE HONORABLE JUDGE ROBERT D. DRAIN,  
UNITED STATES BANKRUPTCY JUDGE

White & Case LLP ("W&C") represents the creditors and parties-in-interest identified below, and pursuant to Rule 2019 of the Federal Rules of Bankruptcy Procedure (the

“Bankruptcy Rules”) supplements W&C’s Verified Statement pursuant to Bankruptcy Rule 2019, dated May 19, 2006 (the “Initial 2019 Statement”)<sup>1</sup> as follows:

1. Since W&C’s filing of the Initial 2019 Statement, on June 1, 2006, W&C was retained by (i) Harbinger Capital Partners LLC and certain of its affiliates (collectively, “Harbinger”) to represent Harbinger’s interests in connection with these Cases and (ii) Marathon Asset Management LLC and/or on behalf of certain of its affiliates (collectively, “Marathon”) to represent Marathon’s interests in connection with these Cases. Harbinger has a business address of 555 Madison Avenue, 16th Floor, New York, New York 10022. Marathon has a business address of 461 Fifth Ave., 10th Floor, New York, NY 10017.

2. Harbinger has claims against the Debtors arising on account of its beneficial ownership of approximately 5.6%, or 32,000,000 shares, of Delphi’s issued and outstanding common shares, which Harbinger purchased at various times between March and June 2006.

3. Marathon has claims against the Debtors arising on account of its beneficial ownership of approximately 1.7%, or 9,834,298 shares, of Delphi’s issued and outstanding common shares, which Marathon purchased at various times between September 2005 and March 2006.

4. In the aggregate, Appaloosa, Wexford, Lampe, Harbinger and Marathon hold beneficial ownership of approximately 21% of Delphi’s issued and outstanding common shares.

5. Appaloosa, Wexford, Harbinger and Marathon also hold individual claims that, in the aggregate, exceed \$285.43 million on account of their respective ownership of debt securities issued by the Debtors.

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<sup>1</sup> In the Initial 2019 Statement, W&C disclosed its representation of Appaloosa Management L.P., with and through certain of its affiliates (collectively, “Appaloosa”), Wexford Capital LLC, with and through certain of its affiliates (collectively, “Wexford”), and Lampe Conway & Co., LLC, with and through certain of its affiliates (collectively, “Lampe”).

6. W&C does not hold any claim against or equity interest in the Debtors. However, W&C may at some future time seek to have its fees and expenses reimbursed by the Debtors' estates in accordance with title 11 of the United States Code.

7. W&C has complied with its ethical obligations with respect to advising its clients regarding this concurrent representation. The clients identified herein have no agreements, arrangements or understandings between or among each other with respect to acquiring, holding, or disposing of the securities of Delphi.

8. In the event W&C undertakes additional representation of other clients in these Cases, this Statement shall be supplemented in accordance with Bankruptcy Rule 2019.

**VERIFICATION**

I, Frank L. Eaton, Esq., an attorney of White & Case LLP, after due inquiry declare under penalty of perjury, pursuant to 28 U.S.C. § 1746, that the facts and representations set forth in this verified statement in accordance with Bankruptcy Rule 2019 are true and correct to the best of my knowledge, information and belief.

Dated: June 6, 2006  
Miami, Florida

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By: /s/ Frank L. Eaton  
Frank L. Eaton

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LLC, LAMPE CONWAY & CO., LLC,  
HARBINGER CAPITAL PARTNERS, LLC AND  
MARATHON ASSET MANAGEMENT LLC

**CERTIFICATE OF SERVICE**

I hereby certify that I caused a true and correct copy of the foregoing **Verified Supplemental Statement of White & Case LLP Pursuant to Fed. R. Bankr. P. 2019** to be duly served on June 6, 2006 by first class mail postage pre-paid on the following parties:

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